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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

ENOCH ADAMS, JR., LEROY ADAMS,)	
ANDREW KOENIG, JERRY NORTON,)	
DAVID SWAN, JOSEPH SWAN,)	
Plaintiffs,)	
)	
vs.)	
)	
TECK COMINCO ALASKA)	
INCORPORATED,)	
Defendant,)	
)	
NANA REGIONAL CORPORATION, and)	
NORTHWEST ARCTIC BOROUGH,)	
Intervenor-Defendants.)	Case No.: A04-00049 CV (JWS)
_____)	

DECLARATION OF RACHEL DAVIS

I, Rachel Davis, depose and aver as follows:

1. I have personal knowledge of and am competent to testify to all facts set forth in this declaration.

2. I am employed by Hartig Rhodes Hoge & Lekisch, PC as a paralegal. Hartig Rhodes serves as counsel for Teck Cominco Alaska Incorporated in the above

captioned matter. I am familiar with this case and disclosures made by Teck Cominco to the plaintiffs.

3. Teck Cominco produced a Curriculum Vitae ("CV") for Gene Andrews to Luke Cole in his capacity as counsel for the plaintiffs on November 15, 2004. Mr. Cole discussed Mr. Andrews' qualifications with him in the deposition that Mr. Cole took of the witness on February 2, 2005.

4. Teck Cominco produced a CV for Kevin Brix to Luke Cole in his capacity as counsel for the plaintiffs on November 15, 2004. Another was produced on December 31, 2003. It was also produced on December 8, 2003. Mr. Cole referenced the CV and discussed the witness' qualifications on pages 44 and 62 of the deposition he took of Mr. Brix on February 22, 2005.

5. Teck Cominco produced a CV for Michael Botz to Luke Cole in his capacity as counsel for the plaintiffs on November 15, 2004. Another was produced on December 30, 2003. Mr. Botz's qualifications were also stated in the Declaration produced to Mr. Cole and filed with the court on September 2, 2003 at Docket 92 in KRPC v. Teck Cominco, A02-231 CV (JWS). Mr. Cole discussed the witness' qualifications on pages 20, 66, 206, and 213 of the deposition he took of Mr. Botz on March 9, 2005.

6. Teck Cominco produced a CV for Robert Fuhrman to Luke Cole in his capacity as counsel for the plaintiffs on November 15, 2004. Another was


produced on January 18, 2008. Mr. Cole discussed the witness' qualifications in the deposition of Mr. Fuhrman on February 24, 2005 at pages 25 and 27.

7. Teck Cominco produced a CV for Joyce Tsuji to Luke Cole in his capacity as counsel for the plaintiffs on November 15, 2004. Another was produced on January 18, 2008. A CV for this witness was also given to Mr. Cole on December 23, 2003. Another was filed with the court and provided to Mr. Cole on August 29, 2003 at Docket 92 in KRPC v. Teck Cominco, A02-231 CV (JWS). Her CV was specifically referenced on pages 9, 22, and 32-33 of the deposition Mr. Cole took of Ms. Tsuji on February 1, 2005.

8. An affidavit articulating the qualifications of Al Ott was filed with the court and provided to Mr. Cole on August 29, 2003 at Docket 92 in KRPC v. Teck Cominco, A02-231 CV (JWS).

9. A declaration articulating the qualifications of Jim Dau was filed with the court and provided to Mr. Cole on September 2, 2003 at Docket 92 in KRPC v. Teck Cominco, A02-231 CV (JWS).

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.


Rachel K. Davis

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of February, 2008,
a true and correct copy of the foregoing was served,
via electronic service, on the below identified parties of
record:

Luke W. Cole
Center on Race, Poverty, & the Environment
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s/Sean Halloran
Hartig Rhodes Hoge & Lekisch PC

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